

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

THERESA BROWN THORNTON, : **CHAPTER 13**
: **Debtor** : **BANKRUPTCY NO. 16-10007-mdc**

**OBJECTION TO CERTIFICATION OF DEFAULT
FILED BY LSF9 MASTER PARTICIPATION TRUST**

The Debtor, by and through counsel, Regional Bankruptcy Center of Southeastern PA, P.C., files the following Objection to the Certification of Default filed by LSF9 Master Participation Trust (hereinafter “LSF9”) on October 18, 2018, and in support thereof respectfully represents as follows:

1. Debtor entered into a Stipulation with LSF9 to resolve a Motion for Relief from the Automatic Stay that was filed with the Court on August 14, 2018 (hereinafter “the Stipulation”), which was approved by Order of the Court on August 15, 2018.
2. On October 3, 2018, LSF9 sent Debtor and her counsel a Notice of Default under the Stipulation. The Notice of Default requested payment of \$4,431.14 to cure the alleged default under the terms of the Stipulation.
3. At the time the Notice of Default was sent, Debtor had already made payment of \$2,275.00 on October 2, 2018.
4. On October 11, 2018, the Debtor made another payment of \$2,250.00, bringing the total paid to \$4,525.00, more than what was requested in the Notice of Default.
5. Despite the cure of the alleged default by the Debtor, LSF9 filed a Certification of Default on October 18, 2018, indicating that the alleged default had not been cured.
6. Debtor seeks a hearing on the Certification of Default unless LSF9 reexamines its records and decides to withdraw the Certification of default.

WHEREFORE, the Debtor requests that this Honorable Court to schedule a hearing and

after the hearing, deny the Certification of Default filed by the LSF9 Master Participation Trust, or at least hold off on granting the Certification of Default or relief from the automatic stay until this matter is heard.

Respectfully submitted,
REGIONAL BANKRUPTCY CENTER OF
SOUTHEASTERN PA, P.C., by:



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